



## ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

03/03/92

This is to acknowledge that you have filed a **Notification of Hazardous Waste Activity** for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ->	NJD048806616
FACILITY NAME ->	L P THEBAULT CO
MAILING ADDRESS ->	345 WALSH DR PARSIPPANY, NJ 07054-3751
INSTALLATION ADDRESS ->	345 WALSH DR PARSIPPANY, NJ 07054-3751

EPA Form 8700-12AB (4-80)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION II  
26 FEDERAL PLAZA  
NEW YORK, NEW YORK 10278

ATTN: PERMITS ADMINISTRATION BRANCH, ROOM 505

TO: SCHUBERTH, MIKE  
COMPLIANCE MGR  
L P THEBAULT CO  
249 POMEROY RD  
PARSIPPANY, NJ 07054-3751

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF WASTE MANAGEMENT

INSPECTION REPORT

REPORT PREPARED FOR:

- ☒ Generator  
☐ Transporter  
☒ HWM (TSD) Facility

FACILITY INFORMATION

Name: Calvin Klein Cosmetics Corp.  
Address: 345 Walsh Dr.  
Parsippany, NJ 07054  
Lot: \_\_\_\_\_ Block: \_\_\_\_\_  
County: \_\_\_\_\_  
Phone: (201) 263-1655  
EPA ID #: NTD048806616  
Date of Inspection: 9-3-87

PARTICIPATING PERSONNEL

State or EPA Personnel: Patricia Watterson (Versar)  
Donald Fulton (Versar)  
Facility Personnel: Keith Demsey - Production Manager

Report Prepared by Name: Patricia Watterson (Versar)  
for Region: II  
Telephone #: (703) 750-3000  
Reviewed by: \_\_\_\_\_  
Date of Review: \_\_\_\_\_

FACILITY NAME: Calvin Klein Cosmetics Corp.

ADDRESS: 345 Walsh Dr

Parsippany NJ 07054

TIME IN: 0900

COUNTY: \_\_\_\_\_

TIME OUT: 1215

EPA ID : NJD0488066163

DATE OF INSPECTION: 9-3-87

PHOTOS TAKEN

☐ YES

☒ NO

If yes, how many? \_\_\_\_\_

SAMPLE TAKEN

☐ YES

☒ NO

NO. OF SAMPLES N/A

NJDEP ID # \_\_\_\_\_

MANIFESTS REVIEWED

☒ YES

☐ NO

Number of manifests in compliance 2

Number of manifests not in compliance 0

Only two manifests was available at the time of the inspection. Additional manifests were requested but, not received.

List manifest document numbers of those manifests not in compliance.

N/A

## TABLE OF CONTENTS

	<u>Page</u>
SUMMARY OF FINDINGS .....	1
Facility Description and Operations .....	1
Hazardous Waste Generation Activities .....	2
Identification of Hazardous Wastes Located Onsite .....	2
CONCLUSIONS .....	3
ATTACHMENT 1 - Pertinent Documentation	
Exhibit 1 - Letter documenting approval of closure plan	
Exhibit 2 - Hazardous Waste Manifests (6/29/87, 6/30/87)	

## SUMMARY OF FINDINGS

### Facility Description and Operations

Calvin Klein Cosmetic Corporation was not in full operation during the site inspection on September 3, 1987. The facility was in the process of moving to a new location and the facility contained only perfume and other cosmetic products which were packaged and ready for shipment. The waste storage area located within the warehouse was absent of waste. The only product that remained was perfume which was drummed and waiting to be bottled. The underground storage tank for the waste had already been removed (July 1987) after approval of the closure plan (see Attachment 1, Exhibit 1). Soil samples around the tank have been collected and the final NJDEP approved closure of the facility is pending on these sample results.

The Calvin Klein facility in Parsippany, New Jersey was a generator of D001 waste, and a TSD facility because they stored this waste longer than 90 days. D001 waste was containerized in two regulated units; a drum storage area, and an underground storage tank. The drum storage area is located within the manufacturing building and consists of a designated portion of a large storage room, which is equipped with floor drains. Calvin Klein containerized waste perfume and bottles in 30-gallon drums in this storage area. The underground storage tank was constructed of steel, and had a 12,000-gallon capacity. Waste perfume, in addition to water and cleaning liquids used to clean the floor, were stored in the underground storage tank.

The site inspection involved a visual inspection of regulated units at the facility in addition to a review of the facility's records. The storage tank previously located in the tank storage area was no longer onsite. After the tank was removed from the ground, the area was filled in with soil, and asphalt was placed on top. The drum storage area did not contain any waste at the time of the inspection.

### Hazardous Waste Generation Activities

Calvin Klein Cosmetics Corporation in Parsippany, New Jersey receives perfume at the plant in 55-gallon containers.. The perfume is bottled at the plant and sent to distributors. Distributors often send unused portions of perfume back to Calvin Klein in bottles. Hazardous waste (D001) is generated from the disposal of the unused portions of perfume. The unused perfume and bottles are stored in 30-gallon drums. The perfume is then emptied out of the bottles and sent through a drain system installed in the floor of the drum storage area to the underground storage tank.

After approval of their closure plan for the underground storage tank and storage container area on May 19, 1987, Calvin Klein commenced with the closure of both of these units (see Attachment, Exhibit 1). However, closure of Calvin Klein's tank storage area is pending on the results of soil sampling around the underground tank. Calvin Klein is vacating the building and moving their operations to Wayne, New Jersey. The facility was inspected as a TSDF because the facility's closure plan has not been officially approved by NJDEP.

### Identification of Hazardous Wastes Located Onsite

At the time of the inspection, there was no hazardous waste at the facility. The underground storage tank which had contained D001 waste had recently been emptied (July 1987) and removed from the site by Advanced Engineering Technology Corporation (AETC). The waste from the emptied tank was sent offsite on June 29 and 30, 1987 (see Attachment 1, Exhibit 2). There was no hazardous waste in the drum storage area during the time of the inspection.

Calvin Klein

• WAS ANY FURTHER DOCUMENT RECEIVED, were they  
REQUESTED AGAIN (P3)

• SOME MINOR COMMENTS

11/30/89

NV

Inspector: JONES  
Address: 1259 RT 46  
PARSIPPANY, NJ  
Telephone No: 201-299-7570

RCRA LAND DISPOSAL RESTRICTION  
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

A. Handler Name CALVIN KLEIN ACCESSORIES B. Street (or other identifier) 345 WAISH DR  
C. City PARSIPPANY D. State NJ E. Zip Code 07054 F. County Name MORRIS  
G. Nature of Business; Identification of Operations: SIC Code(s) WAREHOUSE  
H. EPA ID # NJ D043006616  
I. Handler Contact (Name and Phone Number) KEVIN WHELAN 201-402-9595

II. GENERATOR COMPLIANCE

A. Waste Identification

1. F-Solvents

a. Does the handler generate the following wastes?

(1) P001, P002, P004, or P005 Yes No

(11) P003 Yes No

If an P003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? Yes No

b. Source of the above: Form 8700-12     ; Part B     ; Biennial/Annual Reports       
other (specify)     

Comments

N/A

NO WASTES ARE  
GENERATED. THEY

PERFORMED CLOSURE  
IN 1988 SUCCESSFULLY

BUT NEGLECTED

TO DELIST THEIR  
ID #

HAS BEGUN  
PROCESS FOR

TOTAL DELISTING

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identifying potentially

Handler Name: \_\_\_\_\_  
ID Number: \_\_\_\_\_  
Inspector: \_\_\_\_\_  
Date: \_\_\_\_\_

Comments

misclassified F-solvents, Appendix A-2 presents a list of corresponding P and U wastes. Note concerns below: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. Dioxin wastes

- a. Does the handler report the generation of the following wastes? (The following industries may generate listed dioxin wastes: organic chemicals, pesticide or formulator.)

(i) F020 - F023, F026 - F027    ☐ Yes    ☐ No  
(ii) F028    ☐ Yes    ☐ No

[F-solvent BD&T standards are presented as Appendix B]

3. California Waste Identification

- a. Does the facility handle any of the following wastes?

(i) D002    ☐ Yes    ☐ No  
(ii) D004 - D011    ☐ Yes    ☐ No

- b. Does the generator handle any hazardous wastes characterized by high concentrations of halogenated organic constituents (HOCs), metals, or cyanides?    ☐ Yes    ☐ No

[California waste standards are presented as Appendix C]

- c. Is the generator handling any of the F, K, P, or U wastes subject to the "soft hammer" that may qualify as California wastes due to HOC, metals, or cyanide content? See Appendix D for a listing of California constituents likely to be found by waste code.    ☐ Yes    ☐ No

- d. Has the generator conducted the paint filter test (Method 9095) [§268.32(i)]?    ☐ Yes    ☐ No\*

- e. Has the generator conducted any testing of these hazardous wastes to determine whether the concentrations qualify the hazardous wastes as California wastes?    ☐ Yes    ☐ No

If no, has the generator retained records documenting his "applied knowledge" that the hazardous waste is not a California waste?    ☐ Yes    ☐ No

2/ A potential violation is indicated

Handler Name: \_\_\_\_\_  
ID Number: \_\_\_\_\_  
Inspector: \_\_\_\_\_  
Date: \_\_\_\_\_

Comments

If "no" is answered to both parts of this question, a violation is indicated. [§268.7(a)]

Describe the nature of the records:

- f. Source of the above: Form 8700-12 \_\_\_\_\_; Part A \_\_\_\_\_; Part B \_\_\_\_\_; Biennial/Annual Report \_\_\_\_\_; other (specify) \_\_\_\_\_.

4. First Third Waste Identification

- a. Does the generator handle any of the wastes listed as First Third Wastes in §268.10? See Appendix E for listing. List First Third Wastes handled by the generator here:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- b. Does the generator handle any soft-hammer wastes (Appendices D-1, D-2, and F)? If so, list those wastes:

\_\_\_\_\_  
\_\_\_\_\_

- c. Are any of the soft-hammered wastes California wastes (see Appendix G)? ☐ Yes ☐ No

If yes, the wastes must meet BDAT standards prior to disposal.

- d. Has the Regional Administrator received demonstrations/certifications for all soft hammered wastes to be land disposed [§268.8(a)(2)]? ☐ Yes ☐ No\*

- e. Source of the above: Form 8700-12 \_\_\_\_\_; Part A \_\_\_\_\_; Part B \_\_\_\_\_; Biennial/Annual Report \_\_\_\_\_; other (specify) \_\_\_\_\_.

B. BDAT Treatability Group - Treatment Standards Identification

1. Does the generator mix restricted wastes with different treatment standards for constituents of concern? ☐ Yes ☐ No
2. If yes, did the generator select the most stringent treatment standard for the constituent of concern [§268.41(b)]? ☐ Yes ☐ No\*

2/ A potential violation is indicated

Handler Name: \_\_\_\_\_  
ID Number: \_\_\_\_\_  
Inspector: \_\_\_\_\_  
Date: \_\_\_\_\_

Comments

3. P Solvents - -

- a. Did the generator correctly determine the appropriate treatability group [§268.41] of the waste (e.g., wastewaters containing solvents, nonwastewater (i.e., < 1% TOC), pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

\_\_\_ Yes \_\_\_ No\*

4. California Wastes

- a. Did the generator correctly determine the distinction between liquid hazardous wastes and non-liquid hazardous wastes that contain HOCs in concentrations greater than 1,000 mg/kg [§268.32(h)]?

\_\_\_ Yes \_\_\_ No\*

5. First Third Wastes

- a. Did the generator ascertain whether restricted wastes were appropriately assigned wastewater or nonwastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids) [§268.7(a)]?

\_\_\_ Yes \_\_\_ No\*

- b. Does the facility handle K061 wastes?

\_\_\_ Yes \_\_\_ No

If yes, were nonwastewaters appropriately classified in either the high or low zinc subcategories (≥15% Zn) [§268.7(a)] [§268.41(a)]?

\_\_\_ Yes \_\_\_ No\*

- c. Does the facility handle K101 or K102 wastes?

\_\_\_ Yes \_\_\_ No

If yes, were nonwastewaters appropriately classified in either the high or low arsenic subcategories [§268.7(a)] [§268.41(a)]?

\_\_\_ Yes \_\_\_ No\*

- d. Is there any reason to believe that the generator may have diluted the waste to change the applicable treatment standard (based on review of process operation, pipe routing, point of sampling)?

\_\_\_ Yes \_\_\_ No

2/ A potential violation is indicated

Handler Name: \_\_\_\_\_  
ID Number: \_\_\_\_\_  
Inspector: \_\_\_\_\_  
Date: \_\_\_\_\_

Comments

C. Waste Analysis

1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a):

a. Knowledge of wastes ☐ Yes ☐ No

(i) List wastes for which "applied knowledge" was used:

\_\_\_\_\_  
\_\_\_\_\_

b. TCLP ☐ Yes ☐ No

(i) List wastes for which "TCLP" was used:

\_\_\_\_\_  
\_\_\_\_\_

(ii) Appendix D lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP? ☐ Yes ☐ No

If yes, list: \_\_\_\_\_  
\_\_\_\_\_

c. Total waste analysis ☐ Yes ☐ No

d. If files were retained, describe content and basis of applied knowledge determination:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

If determined by TCLP or total constituent analysis, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: \_\_\_\_\_

Note which wastes were subjected to which tests:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Note any problems (e.g., inadequate analysis, variation of waste composition/generation for applied knowledge) \_\_\_\_\_

*NA*

Handler Name: \_\_\_\_\_  
ID Number: \_\_\_\_\_  
Inspector: \_\_\_\_\_  
Date: \_\_\_\_\_

Comments

- e. Were wastes tested using TCLP or total constituent analysis when a process or wastestream changed [§264.13(a)(3)(i) or §265.13(a)(3)(i)]?  
\_\_\_\_ Yes \_\_\_\_ No\*

2. Did the restricted wastes exceed applicable treatment group treatment standards upon generation [§268.7(a)(1)]?

List those that exceeded standards: \_\_\_\_\_

List those that did not exceed standards: \_\_\_\_\_

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [§268.3]  
\_\_\_\_ Yes\* \_\_\_\_ No

D. Management (TREAT TO EXCEED TREATMENT STANDARDS)

1. Onsite management

- a. Were restricted wastes managed onsite?  
\_\_\_\_ Yes \_\_\_\_ No

If no, go to "2".

- b. For wastes that exceed treatment standards, was treatment in regulated units, storage for greater than 90 days, and/or disposal conducted?  
\_\_\_\_ Yes \_\_\_\_ No

If yes, TSDP checklist must be completed.

2. Offsite Management

- a. If restricted wastes exceed treatment standards, did generator provide treatment facility notification with each shipment? [268.7(a)(1)]:

(i) EPA Hazardous Waste Number? \_\_\_\_ Yes \_\_\_\_ No\*

(ii) Corresponding treatment standard?  
\_\_\_\_ Yes \_\_\_\_ No\*

(iii) Manifest number? \_\_\_\_ Yes \_\_\_\_ No\*

(iv) Waste analysis, if available?  
\_\_\_\_ Yes \_\_\_\_ No

2/ A potential violation is indicated

Handler Name: \_\_\_\_\_  
ID Number: \_\_\_\_\_  
Inspector: \_\_\_\_\_  
Date: \_\_\_\_\_

Identify offsite treatment facilities \_\_\_\_\_

Comments

b. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including:

- (i) EPA hazardous waste I.D. number? \_\_\_\_\_ Yes \_\_\_\_\_ No\*
- (ii) Corresponding treatment standard? \_\_\_\_\_ Yes \_\_\_\_\_ No\*
- (iii) Manifest number \_\_\_\_\_ Yes \_\_\_\_\_ No\*
- (iii) Certification regarding waste and that it meets treatment standards? \_\_\_\_\_ Yes \_\_\_\_\_ No\*

Identify land disposal facilities receiving the BDAT certified wastes \_\_\_\_\_

c. If the generator's waste is subject to a §268.5 case by case exemption, a §268.6 "no migration" exemption, or a nationwide variance (see Appendix E for restricted wastes subject to nationwide variances), does the generator's records indicate that he or she submits with each waste shipment [§268.7(a)(3)]:

- (i) EPA Hazardous Waste Number? \_\_\_\_\_ Yes \_\_\_\_\_ No\*
- (ii) Corresponding Treatment Standards? \_\_\_\_\_ Yes \_\_\_\_\_ No\*
- (iii) All applicable prohibitions? \_\_\_\_\_ Yes \_\_\_\_\_ No\*
- (iv) The manifest number? \_\_\_\_\_ Yes \_\_\_\_\_ No\*
- (v) The date the wastes are subject to prohibitions? \_\_\_\_\_ Yes \_\_\_\_\_ No\*
- (vi) Does generator keep records of all notifications/certifications sent to offsite facilities? \_\_\_\_\_ Yes \_\_\_\_\_ No\*

*NA*

Handler Name: \_\_\_\_\_  
ID Number: \_\_\_\_\_  
Inspector: \_\_\_\_\_  
Date: \_\_\_\_\_

Comments

List all prohibited wastes for which records are not provided per above [§268.7(a)(b):

Identify TSDFs receiving any prohibited wastes subject to any exemptions and variances:

- d. If handler generates a "soft hammer" waste, does the generator send with each "soft hammer" waste shipment to a TSDF and retain copies of, a notice that includes [268.7(a)(4)]:

The EPA Hazardous Waste Number? ☐ Yes ☐ No\*

Applicable prohibitions? ☐ Yes ☐ No\*

The manifest number? ☐ Yes ☐ No\*

Waste analysis data, where available? ☐ Yes ☐ No

- (i) Do the generator's records indicate that any soft-hammer wastes are destined for disposal in a landfill or surface impoundment [§268.33(f)]? ☐ Yes ☐ No

If yes, list facility of destination and waste of concern [§268.8(a)(2)]

- (ii) Has the generator submitted demonstrations and certifications for each "soft-hammered" waste destined to be disposed in landfill or surface impoundment to the Regional Administrator prior to the shipment of waste to the TSDF [§268.7(a)(2)]? ☐ Yes ☐ No\*

- (iii) Has the generator retained a copy of the demonstration on site [§268.8(a)(3)-(a)(4)]? ☐ Yes ☐ No\*

- (iv) Has the generator retained copies of all §268.8 certifications sent to the TSDF [§268.7(a)(6)]? ☐ Yes ☐ No\*

*NA*

• A potential violation is indicated

Handler Name: \_\_\_\_\_  
ID Number: \_\_\_\_\_  
Inspector: \_\_\_\_\_  
Date: \_\_\_\_\_

Comments

(v) Did the generator submit the demonstration to the receiving facility upon the initial shipment of the waste [§268.8(a)(3)-(a)(4)]? ☐ Yes ☐ No\*

(vi) If the Regional Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [§268.8(b)(3)]? ☐ Yes ☐ No\*

E. Storage of Prohibited Waste

1. Were prohibited wastes stored for greater than 90 days? ☐ Yes ☐ No

If yes, was facility operating as a TSD under interim status or final permit [§262.34(b)]? ☐ Yes ☐ No\*

If yes, TSDF Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes  
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ☐ Yes ☐ No

If yes, list type of treatment unit and processes

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

If yes, TSDF checklist must be completed.

